



State of New Jersey

DIVISION OF THE RATEPAYER ADVOCATE

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August 2, 2000

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CHRISTINE TODD WHITMAN
Governor

BLOSSOM A. PERETZ, ESQ.
Ratepayer Advocate
and Director

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Portals II, 445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

**Re: I/M/O New Jersey Board of Public Utilities
Petition for Delegated Authority to Implement
Number Conservation Measures
File No. NSD-L-00-95
CC Docket 96-98**

Dear Secretary Salas:

Enclosed please find an original and five (5) copies of the comments of the New Jersey Division of the Ratepayer Advocate in support of the above-referenced petition.

Please file-stamp one copy and return it to me in the enclosed envelope. Thank you for your attention in this matter.

Very truly yours,

Blossom A. Peretz, Esq.
Ratepayer Advocate

By: Heikki Leesment, Esq.
Deputy Ratepayer Advocate

c: Al McCloud, Federal Communications Commission (2 copies)
Herbert H. Tate, President, New Jersey Board of Public Utilities
Carmen J. Armenti, Commissioner, New Jersey Board of Public Utilities
Frederick F. Butler, Commissioner, New Jersey Board of Public Utilities
Edward D. Beslow, Acting Secretary, New Jersey Board of Public Utilities
Anthony Centralla, Director, Division of Telecommunications,
New Jersey Board of Public Utilities

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of:

The New Jersey Board of Public Utilities)
Petition for Delegated Authority to)
Implement Number Conservation Measures)

NSD File No. L-00-95
CC Docket 96-98

In response to the Federal Communications Commission's ("FCC") July 7, 2000 Public Notice, the New Jersey Division of the Ratepayer Advocate¹ ("Ratepayer Advocate") hereby submits the following comments in support of the New Jersey Board of Public Utilities' Petition for Delegated Authority to Implement Number Conservation Measures ("Petition").

In its Petition, the New Jersey Board of Public Utilities ("Board") requests authority to: (1) implement nondiscriminatory mandatory thousand block pooling; (2) maintain rationing procedures for six months following area code relief; and (3) additional conservation measures, including mandatory reporting requirements, defining number use categories, reclaiming unused number resources and requiring sequential number assignments. If approved, the Board would implement these measures in accordance with the rules, regulations and terms set forth in the FCC's *Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Numbering Resource Optimization*, FCC 00-104; CC Docket No. 99-200 (Released March 31, 2000) ("Report"). Furthermore, the Board has assured the FCC that, if granted its requested authority, it will comply with any future modifications to the rules, regulations and terms.

¹ The New Jersey Division of the Ratepayer Advocate statutorily authorized to represent the interests of all utility consumers - residential, small business, commercial and industrial. The Ratepayer Advocate is a party in all cases where New Jersey utilities seek changes in their rates or services. The Ratepayer Advocate also gives consumers a voice in setting long-range energy, water, and telecommunications policy that will affect the rendering of utility services well into the future. See, Reorganization Plan No. 001-1994, *codified under* N.J.S.A. 13:1D-1.

New Jersey consumers demand relief from the unrelenting need for area codes. New Jersey received its first area code, 201, in 1951 and received its second area code, 609 in 1963. New Jersey did not receive its next area code, 908, until 1991. Since 1991, however, New Jersey has received three new area codes, 973, 732 and 856 in 1997, 1997 and 1999, respectively. Moreover, all six of New Jersey's area codes are in a state of "jeopardy,"² thereby requiring the addition of six new area codes, bringing the state's total to twelve. This need for additional telephone numbers is not the result of increased need for telephone numbers, but rather, is the result of a grossly inefficient means of number distribution and use. Relief from this nightmare of administrative inefficiency can only be achieved through the implementation of number conservation measures as requested by the Board. The Board's Petition, if approved, would permit the implementation of necessary, long-overdue number conservation measures. Therefore, the Ratepayer Advocate strongly recommends the FCC approve the Board's Petition immediately.

Very truly yours,

Blossom A. Peretz, Esq.
Ratepayer Advocate



By: Heikki Leesment, Esq.
Deputy Ratepayer Advocate

Dated: August 2, 2000

² The 201 area code is scheduled to exhaust 1Q 2000; the 973 area code is scheduled to exhaust 4Q 2000; the 732 area code is scheduled to exhaust 2Q 2001; the 908 area code is scheduled to exhaust 1Q 2001; the 609 area code is scheduled to exhaust 4Q 2001; and the 856 area code is scheduled to exhaust 2002.